## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

SYMBOLOGY INNOVATIONS, LLC

Plaintiff,

v.

CIVIL ACTION NO. 2:17-cv-00024-JRG

**JURY TRIAL DEMANDED** 

HARMAN INTERNATIONAL INDUSTRIES, INCORPORATED D/B/A JBL

Defendant.

## MOTION TO DISMISS VOLUNTARILY WITH PREJUDICE

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Plaintiff Symbology Innovations, LLC ("Symbology") pursuant to Fed. R. Civ. P. 41 (a), hereby move for an order dismissing all claims by Symbology against Defendant Harman International Industries, Incorporated d/b/a JBL, in this action WITH PREJUDICE, with each party to bear its own costs, expenses and attorney's fees.

Dated: March 17, 2017 Ferraiuoli LLC

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Attorney(s) for Plaintiff Symbology Innovations, LLC

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 17, 2017, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/Eugenio J. Torres-Oyola Eugenio J. Torres-Oyola